

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

JESSE PIERCE and MICHAEL PIERCE,)
on behalf of themselves and all others)
similarly situated,) CASE NO. 3:13-cv-641
)
Plaintiffs,) Magistrate Judge: C. Clifford Shirley, Jr.
)
vs.)
)
WYNDHAM VACATION RESORTS,) COLLECTIVE ACTION COMPLAINT
INC., and WYNDHAM VACATION) FOR VIOLATIONS OF THE FAIR
OWNERSHIP, INC.,) LABOR STANDARDS ACT OF 1938
)
Defendants.)

PLAINTIFFS' STATEMENT OF FACTS PRECLUDING SUMMARY JUDGMENT

Come Plaintiffs and submit this Statement of Facts Precluding Summary Judgment.

1. Since bankruptcy filings are a matter of public records, Defendants were on notice of Jeremy Saine's bankruptcy proceeding as early as December 28, 2018.

RESPONSE:

2. Since bankruptcy filings are a matter of public records, Defendants were on notice of Rachael Taylor's bankruptcy proceeding as early as January 29, 2018.

RESPONSE:

3. Since bankruptcy filings are a matter of public records, Defendants were on notice of Sean Jeter's bankruptcy proceeding as early as May 20, 2014.

RESPONSE:

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2021, a true and correct copy of the foregoing has been served on the following individuals via the court's electronic service:

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